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MEMO ENDORSED

January 26, 2022

2/2/22

OK

Colleen Mc Mahon

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

Defendant James Cahill's ("Cahill") is permitted to travel, with prior approval from Pretrial Services ("PTS") to certain stores in order to shop for his household. By this letter, Cahill respectfully requests that he be permitted to travel to two additional stores; Stop and Shop is in Nanuet, New York and Stew Leonard's is in Paramus, New Jersey. Travel to these stores, if permitted, will be subject to the same restrictions, necessity for prior Pretrial Services ("PTS") approval and production of receipts requirements that apply to all other shopping trips. The government, by Assistant United States Attorney Jason Swergold, defers to PTS on this application and PTS, by United States Pretrial Services Officer Andrew Abbott, consents.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)
AUSA Daniel Sassoon (by ECF)
AUSA Jun Xiang (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Andrew Abbott (by email)

